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*Attorneys for Defendants
Irico Group Corp. and
Irico Display Devices Co., Ltd.*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,) Case No. 07-cv-05944-JST
THIS DOCUMENT RELATES TO:) MDL No.: 1917
ALL INDIRECT PURCHASER ACTIONS) **DECLARATION OF ANDREW
LUCARELLI IN SUPPORT OF IRICO
DEFENDANTS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CHUNGHWIA MATERIAL SHOULD
BE SEALED PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5(f)**

1 I, Andrew Lucarelli, declare as follows:

2 1. I am an attorney admitted to practice law in Washington, D.C. and am employed
3 by the law firm of Baker Botts L.L.P., which represents Defendants Irico Group Corporation
4 (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display”) (collectively, “Irico
5 Defendants”). I make this Declaration based on my personal knowledge and in support of the
6 Irico Defendants’ Administrative Motion to Consider Whether Chunghwa Material Should Be
7 Sealed Pursuant to Civil Local Rules 7-11 and 79-5(f).

8 1. Attached hereto as Exhibit 5 is a true and correct copy of a document produced
9 in this litigation by defendant Chunghwa Picture Tubes, Ltd. and bearing the bates label
10 CHU00030668-0669E.

11 2. Attached hereto as Exhibit 52 is a true and correct copy of excerpts from the
12 deposition of Jin-Song Lu, dated February 28, 2023.

13 2. Attached hereto as Exhibit 73 is a true and correct copy of a certified translation
14 of a document produced by defendant Chunghwa Picture Tubes, Ltd. in this litigation and bearing
15 the Bates label CHU00047273.

16 3. Attached hereto as Exhibit 75 is a true and correct copy of Defendants Irico Group
17 Corp. and Irico Display Devices Co., Ltd.’s Notice of Motion and Motion for Summary Judgment,
18 dated July 28, 2023.

19 I declare under penalty of perjury that the foregoing is true and correct. Executed this
20 28th day of July, 2023, in Rockville, Maryland.

21 */s/ Andrew L. Lucarelli*

22 Andrew. L. Lucarelli (*pro hac vice*)
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